

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

NATIONAL ASSOCIATION FOR THE
ADVANCEMENT OF COLORED PEOPLE,
SPRING VALLEY BRANCH; JULIO
CLERVEAUX; CHEVON DOS REIS; ERIC
GOODWIN; JOSE VITELIO GREGORIO;
DOROTHY MILLER; and HILLARY
MOREAU,

Plaintiffs,

v.

EAST RAMAPO CENTRAL SCHOOL
DISTRICT and MARYELLEN ELIA, IN
HER CAPACITY AS THE
COMMISSIONER OF EDUCATION OF
THE STATE OF NEW YORK,

Defendants.

17 Civ. 8943 (CS) (JCM)

**DECLARATION OF CLAUDIA T. SALOMON IN OPPOSITION TO
THE DISTRICT'S PROPOSED REMEDIAL PLAN AND IN SUPPORT OF
PLAINTIFFS' PROPOSED REMEDIAL PLAN**

CLAUDIA T. SALOMON, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury as follows:

1. I am a Partner of the law firm Latham & Watkins LLP, co-counsel for Plaintiffs with the New York Civil Liberties Union Foundation in the above-captioned matter. I am a member in good standing of the bar of the State of New York and this Court.

2. I respectfully submit this declaration with Plaintiffs' Memorandum of Law in Opposition to the District's Proposed Remedial Plan and in Support of Plaintiffs' Proposed Remedial Plan. I am familiar with all of the facts and circumstances set forth herein.

3. Attached to this declaration as Exhibit A is a true and correct copy of correspondence from the District's counsel, David Butler, dated February 21, 2019.

4. Attached to this declaration as Exhibit B is a true and correct copy of an email chain between Plaintiffs' counsel, Russell Mangas and Perry Grossman, and Defendant's counsel, William Cravens, dated between May 27, 2020 and July 14, 2020. Plaintiffs have not received a response from the District.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 27, 2020
New York, New York

/s/ Claudia T. Salomon
Claudia T. Salomon